

December 22, 2014
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REPA5-2528-001

Mr. Allen Wojtas
Contract Level Task Order Contracting Officer Representative
U.S. EPA Region 5
77 West Jackson Blvd. (LP-7J)
Chicago, IL 60604

Subject: EPA Contract No. EP-W-12-031, Task Order 5528, Corrective Action Support for ArcelorMittal Indiana Harbor West, Task 04. Technical Review of the July 2014 Response to EPA Comments on Additional Site Investigation Report for the Former Coke Plant, ArcelorMittal Indiana Harbor West LLC, East Chicago, Indiana

Dear Mr. Wojtas:

In response to Task Order 5528 under EPA Contract No. EP-W-12-031, Task 04, Booz Allen Hamilton (Booz Allen) has reviewed the July 2014 Response to EPA Comments on the Additional Site Investigation Report for the Former Coke Plant for the ArcelorMittal Indiana Harbor LLC West Mill (ArcelorMittal West) facility in East Chicago, Indiana. Booz Allen's review focused on technical adequacy and consistency with Agency policy. Comments generated during the course of this review are included in the attachment and should be addressed prior to approval of the report.

As discussed in the response to comments, upon EPA approval of the facility's comment responses, ArcelorMittal intends to prepare a Pre-Design Work Plan to address the additional delineation work requested by EPA and pre-design remedial activities required to enable completion of a Corrective Measures Study Report. Based on our review, Booz Allen identified the following additional activities that should be included in the Pre-Design Investigation Plan to address data gaps:

- Sampling and evaluation of the uppermost two feet, not just the uppermost six inches, of soil, particularly at areas with surface soil data quality objective (DQO) exceedances

- Sampling to confirm that soil between 2 and 8 feet bgs at boring MW-824D does not contain DQO exceedances
- Advancement of a soil boring in the immediate vicinity of boring MW-826M in an effort to delineate the vertical extent of PAH contamination in this area.
- Steps to confirm and document that the aquitard is continuous across the site.

In addition, concerns regarding the proposed 5-step process for evaluating risks to aquatic organisms in the Indiana Harbor Ship Canal discussed in the attachment (General Comment 3) should be addressed prior to EPA approval of the facility's comment responses.

If you have any questions regarding this deliverable, please contact me at (312) 578-4757 or Michele Benchouk at (215) 393-1233.

Sincerely,



Frances B. Hodge
Task Order Manager

BOOZ ALLEN HAMILTON

Enclosure

cc: Brian Freeman, EPA TOCOR
Mike Mikulka, EPA Technical Representative